

Attachment A

From: [Caitlyn Wade](#)
To: ["Brittany Poley"](#)
Cc: [Sistla, Alex \(USAGAN\)](#); [Kaushal, Samir \(USAGAN\)](#); [Suzanne Hashimi](#)
Subject: RE: Detling Requests to Charge
Date: Sunday, October 31, 2021 1:02:00 PM

We believe the word "requested" in the second sentence should be "required". Additionally, we would request that the court add this last sentence, "If you believe that there is reasonable doubt that anyone else committed an element of the charged offenses instead of Mr. Detling, then you must acquit." We believe it is a correct statement of the law and is based on the evidence that was admitted at trial.

Thanks,

Caitlyn Wade

Staff Attorney
Federal Defender Program, Inc.
Suite 1500, Centennial Tower
101 Marietta Street, NW
Atlanta, Georgia 30303
P: 404.688.7530
F: 404.688.0768

From: Brittany Poley <Brittany_Poley@gand.uscourts.gov>
Sent: Saturday, October 30, 2021 5:09 PM
To: Caitlyn Wade <Caitlyn_Wade@fd.org>
Cc: Sistla, Alex (USAGAN) <Alex.Sistla@usdoj.gov>; Kaushal, Samir (USAGAN) <Samir.Kaushal@usdoj.gov>; Suzanne Hashimi <Suzanne_Hashimi@fd.org>
Subject: RE: Detling Requests to Charge
Importance: High

The Court instructs counsel to also respond to the following instruction as being a possibility of the sole one the court may include:

The Court has previously instructed you on the elements that the government must prove beyond a reasonable doubt for you to find Mr. Detling guilty of the crimes charged in the indictment. You must find that Mr. Detling personally engaged in all of the requested elements of the charged offenses for him to be guilty of those charges.

Thanks,

Brittany Poley | Courtroom Deputy to the Honorable Leigh Martin May
United States District Court | Northern District of Georgia
2167 U.S. Courthouse | 75 Ted Turner Drive S.W. | Atlanta, GA 30303

From: Caitlyn Wade <Caitlyn_Wade@fd.org>
Sent: Saturday, October 30, 2021 2:56 PM

To: Brittany Poley <Brittany_Poley@gand.uscourts.gov>

Cc: Sistla, Alex (USAGAN) <Alex.Sistla@usdoj.gov>; Kaushal, Samir (USAGAN) <Samir.Kaushal@usdoj.gov>

Subject: Detling Requests to Charge

Brittany,

I have attached the brief in support of the theory of the defense jury charge as well as a supplemental request to charge that covers the pattern charge on impeachment of a witness because of inconsistent statements. I have also filed these on ECF.

Thanks,

Caitlyn Wade

Staff Attorney

Federal Defender Program, Inc.

Suite 1500, Centennial Tower

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Atlanta, Georgia 30303

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